

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

IN RE:

PRIME CAPITAL VENTURES, LLC,

Debtor.

Chapter 7

Case No. 23-11302 (REL)

**MOTION FOR LIMITED ADMISSION, *PRO HAC VICE*, OF DAVID T.B. AUDLEY**

Pursuant to Local Bankruptcy Rule (“*LBR*”) 2014-2(b)(1), Michael Adam Samuels (“*Movant*”), an attorney with the law firm of Chapman and Cutler LLP, and a member in good standing of the Bar of the New York, admitted to practice before this Court, moves for the limited admission *pro hac vice* of David T.B. Audley, who is also an attorney at Chapman and Cutler LLP, to act as counsel for ER Tennessee LLC, in the above captioned bankruptcy case and any related adversary proceedings.

Mr. Audley is a member of the bar of the State of Illinois, and has been admitted to practice in the State of Illinois. Mr. Audley is a member in good standing in Illinois and/or a member, and is not subject to any pending disciplinary proceedings. *See* Mr. Audley’s Certificate of Admission to the Bar of Illinois submitted herewith as Exhibit A.

WHEREFORE, the undersigned respectfully requests that the Court will enter an Order admitting David T.B. Audley *pro hac vice* as counsel for ER Tennessee LLC in the above-captioned chapter 7 case and any related adversary proceedings.

Dated: January 5, 2024

CHAPMAN AND CUTLER LLP

/s/ Michael Adam Samuels

Michael Adam Samuels (NY #2512713)

CHAPMAN AND CUTLER LLP

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*Attorneys for ER Tennessee LLC*

**CERTIFICATION OF DAVID T.B. AUDLEY IN SUPPORT OF MOTION FOR  
LIMITED ADMISSION, *PRO HAC VICE*, OF DAVID T.B. AUDLEY**

Pursuant to LBR 2014-2(b)(1)(A), I, David T.B. Audley, hereby certify as follows in support of the motion for limited admission, *pro hac vice*, that has been filed on my behalf:

1. I am eligible for admission, *pro hac vice*, to this Court. I was admitted to practice in the State of Illinois on November 17, 1985; The United States District Court, Northern District of Illinois on December 19, 1985; The United States Court of Appeals for the Seventh Circuit on December 4, 1992; and The United States District Court, Southern District of Indiana September 19, 2002. I am a member of good standing in the foregoing courts.

2. I reside in Lake Bluff, Illinois and my office address is Chapman and Cutler LLP, 320 South Canal Street Chicago, IL 60606.

3. I have never been held in contempt of court, censured, suspended or disbarred by any court. There are no disciplinary proceedings pending against me and no discipline has ever been imposed against me.

4. I have never been convicted of a felony or misdemeanor.

5. I also certify that I am generally familiar with the provisions of the Judicial Code (Title 28 U.S.C.), which pertain to the jurisdiction of, and practice in, the United States Bankruptcy Courts; the Bankruptcy Code (title 11 U.S.C.); the Federal Rules of Bankruptcy Procedure; the Local Rules of the Bankruptcy Court for the Northern District of New York; and the New York Rules of Professional Conduct. I further affirm faithful adherence to these rules and responsibilities.

Dated: August 5, 2024

/s/ David T.B. Audley

David T.B. Audley  
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*Attorneys for ER Tennessee LLC*

# EXHIBIT A

## **Certificate of Admission To the Bar of Illinois**

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

David Thomas Beech Audley

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/07/1985 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 18th day of  
December, 2023.



Clerk,  
Supreme Court of the State of Illinois